

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI

A.B.S., as surviving daughter of deceased)
ANTHONY L. SMITH, and a minor, by)
and through her next friend CHRISTINA)
WILSON,)
Plaintiff,)
v.) Case No. 4:12-CV-00202-JCH
BOARD OF POLICE)
COMMISSIONERS, et al.,)
Defendants.)

**INTERVENOR'S MOTION FOR LEAVE TO FILE UNEDITED
GOLDSMITH REPORT UNDER SEAL**

The Missouri Attorney General's Office respectfully requests leave to file under seal the unedited version of the Hal Goldsmith report, and a one-page document providing the identities of persons identified in the Goldsmith report by monikers, both of which are attached as Exhibits to the Attorney General's Notice of Filing, filed contemporaneously herewith. The Office makes this request in response to the Court's order, Doc. 132, to provide an unedited version of the Goldsmith report for in-camera review. The document includes material subject to claims of attorney-client privilege and client confidentiality, so filing the report under seal is appropriate to preserve privilege and confidentiality.

March 16, 2018

Respectfully submitted,

JOSHUA D. HAWLEY
MISSOURI ATTORNEY GENERAL

/s/ D. John Sauer

D. John Sauer, MO 58721
First Assistant and Solicitor
Post Office Box 861
St. Louis, MO 63188
Tel: (314) 340-7861
Fax: (314) 340-7029
Email: John.Sauer@ago.mo.gov

*Attorneys for the Missouri Attorney General's
Office*

CERTIFICATE OF SERVICE

I certify that on this , 2018, the foregoing was filed electronically using the Court's CM/ECF system, to be served on all counsel of record.

/s/ D. John Sauer